

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

CBC RESTAURANT CORP., et al.,¹

Debtors.

Chapter 11

Case No. 23-10245 (KB)

(Joint Administration Requested)

Re: Docket No. 18

**CERTIFICATION OF COUNSEL REGARDING MOTION OF THE DEBTORS FOR
ENTRY OF AN INTERIM ORDER: (A) AUTHORIZING THE DEBTORS' USE OF
CASH COLLATERAL; (B) SCHEDULING A FINAL HEARING; AND (C) FOR
RELATED RELIEF**

I, Mette H. Kurth, counsel to the debtors and debtors in possession (the "Debtors") hereby certify that:

1. On February 23, 2023, the Debtors filed their *Motion of the Debtors for Entry of an Interim Order: (A) Authorizing the Debtors' Use of Cash Collateral; (B) Scheduling a Final Hearing; And (C) for Related Relief* [D.I. 18].

2. Subsequently, the Debtors and their prepetition lender, in consultation with the Office of the U.S. Trustee, have engaged in negotiations regarding a consensual form of cash collateral order.

3. Attached hereto as **Exhibit 1** is a form of order that the counsel for Debtors and the prepetition secured lender believe, subject to final review and comment from their clients, will

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, include CBC Restaurant Corp. (0801), Corner Bakery Holding Company (3981), and CBC Cardco, Inc. (1938). The Debtors' service address is 121 Friends Lane, Suite 301, Newtown PA 18940.

resolve the issues raised by the prepetition secured lender regarding the requested relief. The form of order also addresses many of the comments received from the Office of the U.S. Trustee.

4. Attached hereto as **Exhibit 2** is a redline comparing the original form of cash collateral order submitted with the Debtors' motion to the revised order.

Dated: February 24, 2023
Wilmington, Delaware

/s/ Mette H. Kurth

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